

INSPECTION REPORT

Inspection Entry Date/Time	6/5/2024 10:25 AM (CT)	Announced: No		
Inspection Exit Date/Time	6/5/2024 11:30 AM (CT)	Access: Granted		
Regulatory Program	RCRA			
Type of Inspection	Focused Compliance Inspection (FCI)			
Facility or Site Name	Martin Holdings, LLC			
Facility/Site Identifier	LAR000054148			
Facility/Site Physical Address	120 17th St			
City, State, Zip Code	Golden Meadow, LA 70357			
County/Borough	Lafourche Parish			
Generator Status	VSQG			
NAICS	213112			
Type of Operation	Martin Holdings, LLC operates a cargo terminal at Port Fourchon			
Geographic Coordinates	29.114936, -90.206714			
Additional Persons Participating in Inspection:				
Name	Title	Organization	Email	Phone
Joyce Johnson	Inspector	EPA REGION 6	Johnson.Joyce-r6@epa.gov	(214) 665-8548
Dedriel Gardner	Inspector	EPA REGION 6	Gardner.Dedriel@epa.gov	(281) 983-2133
Neil Rapp	Contractor	Eastern Research Group (ERG)	Neil.Rapp@erg.com	(480) 450-6517
Lead Inspector:				
Vince Damiano				
	ERG		Vince.Damiano@erg.com	(703) 835-6281

SECTION I – INTRODUCTION**Site Entry and Purpose of the Inspection**

Type of inspection: Focused Compliance Inspection (FCI)

Port Fourchon and surrounding facilities were selected for inspection based on an Environmental Justice and Regional initiative to evaluate facilities at ports receiving or transporting Resource Conservation and Recovery Act (RCRA)-regulated hazardous wastes, and/or maintaining an International Convention for the Prevention of Pollution from Ships (MARPOL) Annex V Certificate of Adequacy (COA) issued by the U.S. Coast Guard (USCG).

This report is based on information supplied by the facility representatives, inspector observations, port related facilities, and records including verbal or written statements made during or after the on-site inspection, and materials shown, demonstrated, or submitted to the EPA during or after the on-site inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and public records may be included in this report.

Attendees

Title/Organization	Name	Phone	Email	Opening Conf.	Closing Conf.
Lead Inspector/ Contactor/ERG	Vince Damiano	(703) 835-6281	Vince.Damiano@erg.com	Yes	Yes
RCRA Inspector/ Contractor/ERG	Neil Rapp	(480) 450-6517	Neil.Rapp@erg.com	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Joyce Johnson	(214) 665-8548	Johnson.Joyce-r6@epa.gov	Yes	Yes
Inspector/Enforcement Officer/EPA Region 6	Dedriel Gardner	(281) 983-2133	Gardner.Dedriel@epa.gov	Yes	Yes

Facility General Description

Tenant/Area	Inspection Date	Process Description	Areas of Concern
Martin Holdings, LLC	06/05/24	Martin Holdings, LLC (Martin) operates a cargo terminal and has six tenants that it services. Martin loads and offloads vessels for tenants and does not allow third parties to use its dock space. Martin offloads waste including hazardous waste from vessels at its docks, but the tenants at the terminal manage the waste after offloading. The company does not store or manage any of the waste removed from vessels. Martin also unloads USDA-regulated (APHIS) waste from vessels, which it places directly into dumpsters. The dumpsters are managed by its tenants and their ship agents. Martin is a very small quantity generator (VSQG) of hazardous waste and maintains a MARPOL COA for Annexes I, II, and V.	No

SECTION II – OBSERVATIONS

Tenant: Martin Holdings, LLC			
Section: 2.1	Date: 6/5/2024, 10:25 A.M.	Contains AOC: No	Contains CBI: No
Lead Inspector: Vince Damiano		Attendees: Joey Bouziga (General Manager), Matt Labat (QHSE Manager), Brittney Serigney (Environmental Supervisor)	
Martin personnel provided the inspection team with a summary of operations at the facility. Martin operates a cargo terminal and has six tenants (Talos Energy, Renaissance Offshore, Equinor, Arena Offshore, Enterprise Offshore, and Hilcorp) that it services. Martin mostly loads and offloads supplies and oil field equipment from vessels and trucks for its tenants. The facility does not allow third parties to use its dock space. Martin also offloads waste including hazardous waste from vessels using cranes or forklifts at its docks and immediately moves the waste to the tenants’ leased areas, but the tenants at the terminal manage the waste after offloading. Martin stated they will rarely offload waste and the majority of their offloads are supplies and equipment. Martin does not store or manage any of the waste removed from vessels. In addition, Martin unloads APHIS waste from vessels, which it places directly into dumpsters for its tenants. The dumpsters are managed by its tenants and their ship agents. Martin maintains a MARPOL COA for Annexes I, II, and V. Martin is registered with EPA as a transfer facility for used oil (LAR000054163). However, Mr. Bouziga stated that Martin does not act as a used oil transfer facility and that Martin registered with EPA in anticipation of potential future operations. The facility is a VSQG of hazardous waste, mostly generated from day-to-day maintenance operations at the terminal (i.e., paint waste). Martin also generates used oil from equipment maintenance which it disposes of with American Recovery. After the opening conference, the inspection team conducted a visual inspection of the facility’s dock space and warehouse. The inspection team also observed the bays on the individual tenants on the dock space where supplies and equipment are offloaded and placed for the tenants to manage. During the visual inspection, the inspection team did not observe any waste in the bays. No areas of concern (AOCs) were identified during the visual inspection; however, further EPA review may change or add to their potential AOCs. A closing conference was conducted at approximately 11:20 AM with Martin personnel. The inspection team requested a copy of the Martin’s MARPOL COA, which Ms. Serigney provided on 6/6/2024. The COA can be found in Appendix 1.			

SECTION III – RECORDS REVIEW

No RCRA regulated records were reviewed during this focused onsite inspection besides those mentioned in Section II.

SECTION IV – AREA OF CONCERN

No apparent AOCs were identified during this inspection.

SECTION V – FOLLOW UP

Documents or files provided by the facility were transmitted via email.

Communication Log

After the inspection, additional information was emailed to EPA including:

1. 6/6/2024 GMS email – Brittney Serigney provided a copy of Martin's COA.

SECTION VI – LIST OF APPENDICES

Appendix 1 - Martin COA

Appendix 1

Martin COA

United States Coast Guard

Certificate Of Adequacy
for
Reception Facility



This certifies that:

Chouest Port Facilities

has facilities adequate

16021 East Main Street

to receive

Cut Off, LA

70345

MARPOL I

MARPOL V

From oceangoing ships, as required by the International Convention for the Prevention of Pollution from Ships, 1973. As modified by the protocol of 1978 (MARPOL 73/78), The Act to Prevent Pollution from Ships, 33 USC 1901-1912 and associated U.S. Regulations in 33 CFR 158.

This certificate is issued pursuant to an application dated **February 04, 2021** and an inspection dated **March 10, 2021**, copies of which are attached, and part of this certificate. Each terminal listed in the application shall maintain a copy of this certificate available for inspection by Coast Guard personnel and the master, operator, agent, or owner of any ship using or intending to use this terminal.

Terminals and ports required to have an operations manual for oil transfer described in 33 CFR 154.300 shall attach a copy of this certificate thereto.

The terminal/port person in charge identified in the attached application shall notify the U.S. Coast Guard Captain of the Port (COTP) in writing after any of the reception facility information or terminal/port information identified in 33 CFR 158.165 changes.

The terminal/port owner, operator, or person in charge are liable for civil penalties of up to \$25,000 for violations of the provisions of 33 CFR 158.

The terminal/port owner, operator, or person in charge shall ensure that the reception facility holds each state, local, and federal permit and license required by environmental laws and regulations concerning garbage, residues and mixtures containing oil or noxious liquid substances. This certificate certifies compliance with applicable sections of 33 CFR 158, but does not certify compliance with any other law or regulation.

This certificate is valid for a period of 5 years from the date issuance; or until suspended or revoked; or until 30 days after the operator cited on the certificate changes; at which time it shall be promptly returned to the U.S. Coast Guard COTP.

This Certificate Expires: June 03, 2026

June 03, 2021

5 years from date of issuance

J. W. Russell
Signature of COTP By Direction
J. W. Russell, CAPT

June 3, 2021

Date

June 3, 2021

Typed Name of COTP

Marine Safety Unit Houma

Date

985-850-6400

COTP Zone

Phone

The following waivers to this certificate are granted. The waivers shall be attached to and are part of this certificate.

Waiver Description (brief description)

Expire Date (if applicable)

